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ILLINOIS COMMERCE COMMISSION**

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**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

CHIEF CLERK'S OFFICE

Commonwealth Edison Company )

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Docket No. 01-0423

Petition for approval of delivery service tariffs and )  
tariff revisions and of residential delivery services )  
implementation plan, and for approval of certain )  
other amendments and additions to its rates, terms, )  
and conditions )

**PETITION OF  
THE ENVIRONMENTAL LAW AND POLICY CENTER  
FOR LEAVE TO INTERVENE**

THE ENVIRONMENTAL LAW AND POLICY CENTER ("ELPC"), pursuant to 83 Ill. Adm. Code Section 200.200, respectfully petitions for leave to intervene in the above-captioned proceeding. In support of this petition, ELPC states as follows:

1. ELPC is a public interest environmental quality and economic development organization based in Chicago working to improve environmental quality and public health by promoting sustainable energy resources. ELPC is interested both in the environmental quality effects of Commonwealth Edison's delivery service tariffs and in fair rate treatment of consumers.

2. On June 1, 2001, Commonwealth Edison Company filed a petition with the Illinois Commerce Commission ("Commission") seeking Commission approval of delivery service tariffs and tariff revisions, of a residential delivery services implementation plan and certain other amendments and additions to its rates, terms and conditions.
3. ELPC and its members use electricity provided by Commonwealth Edison Company.
4. ELPC and its members will be materially affected by the outcome of this proceeding, particularly the impact of the new delivery service tariffs on the development of a market for "green power," implementation of energy efficiency measures and cost-effective investment in distributed generation.
5. ELPC's intervention and participation in this proceeding is in the public interest and will not delay this proceeding.
6. ELPC requests that the following be placed on the official service list in this proceeding:

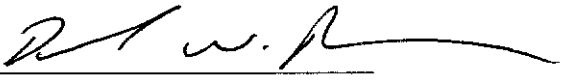
Daniel W. Rosenblum  
Senior Attorney  
Environmental Law and Policy Center  
35 East Wacker Drive, Suite 1300  
Chicago, Illinois 60601  
Phone: (312) 795-3700  
Fax: (312) 332-1580  
E-Mail: [drosenblum@elpc.org](mailto:drosenblum@elpc.org)

7. ELPC agrees to accept service by electronic means as provided for in 83 Ill. Adm. Code 200.1050 of the Commission's Rules of Practice.

WHEREFORE, for the foregoing reasons, the ENVIRONMENTAL LAW AND  
POLICY CENTER respectfully requests that the Commission grant this motion for leave to  
intervene and to participate as a party in these proceedings.

Respectfully submitted,

ENVIRONMENTAL LAW AND POLICY  
CENTER

By:   
One of its Attorneys

Daniel W. Rosenblum  
Senior Attorney  
Environmental Law and Policy Center  
35 East Wacker Drive, Suite 1300  
Chicago, Illinois 60601  
Phone: (312) 795-3700  
Fax: (312) 332-1580  
E-Mail: [drosenblum@elpc.org](mailto:drosenblum@elpc.org)

July 10, 2001

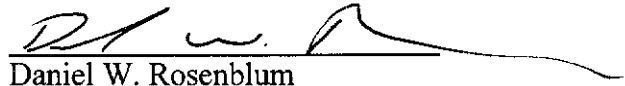
VERIFICATION

Commonwealth Edison Company )

Docket No. 01-0423

Petition for approval of delivery service tariffs and )  
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other amendments and additions to its rates, terms, )  
and conditions )

Daniel W. Rosenblum, being first duly sworn upon oath, deposes and states that he has read the foregoing Petition to Intervene of the Environmental Law and Policy Center in Illinois Commerce Commission Docket No. 10-0423, that he knows the contents thereof, and that to the best of his knowledge, information and belief, based upon reasonable inquiry, that said contents are true and correct.

  
Daniel W. Rosenblum  
Senior Attorney  
Environmental Law and Policy Center

SUBSCRIBED and SWORN to  
Before me this 10th day of July, 2001




**STATE OF ILLINOIS**  
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**NOTICE OF FILING**

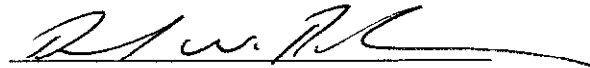
PLEASE TAKE NOTICE THAT on the 10<sup>th</sup> day of July, 2001, we have filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capital Avenue, Springfield, IL 62794-9280, the enclosed Petition of The Environmental Law and Policy Center for Leave to Intervene.

  
Daniel W. Rosenblum  
One of the Attorneys

Daniel W. Rosenblum  
Senior Attorney  
Environmental Law and Policy Center  
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**PROOF OF SERVICE**

The undersigned states that copies of the foregoing petitions for leave to intervene were served upon each of the below-named parties on July 10, 2001, by electronic mail and by placing copies thereof in the United States mail with first class postage affixed.

A handwritten signature in dark ink, appearing to read 'D. W. Rosenblum', is written over a horizontal line.

Daniel W. Rosenblum  
One of the Attorneys

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